

**IN THE UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF PENNSYLVANIA (PHILADELPHIA)**

In re:) CASE NO. 20-10291-amc
)
SONJA D. OGDEN,) JUDGE: ASHLEY M. CHAN
)
Debtor.) CHAPTER 13
)
)
)

NOTICE OF FORBEARANCE DUE TO THE COVID-19 PANDEMIC

Now comes Freedom Mortgage Corporation (“Creditor”), by and through undersigned counsel, and hereby submits Notice of Forbearance to the Court based on the Debtors’ request for mortgage payment forbearance due to hardship caused by the COVID-19 pandemic.

The Debtors contacted Creditor requesting a forbearance period for twelve (12) months and has elected to not tender mortgage payments to Creditor that would come due on the mortgage starting February 01, 2021 to January 31, 2022. Creditor has granted the Debtor’s forbearance request. To the extent the forbearance period is not extended for an additional period of time as provided under the CARES Act, Debtors will resume mortgage payments beginning February 01, 2022. Near the end of the forbearance period, debtors, through counsel, will need to engage with creditor on a solution for payments suspended during the forbearance.

Creditor does not waive any rights to collect the payments that come due during the forbearance period. Furthermore, Creditor does not waive its rights under other applicable non-bankruptcy laws and regulations, including, but not limited to, RESPA, and the right to collect on any post-petition escrow shortage.

Creditor does not waive its rights to seek relief from the automatic stay for other reasons other than non-payment of the Mortgage, including, but not limited to, a lapse in insurance coverage or payment of property taxes.

Respectfully submitted,

/s/ Lindsey H. Morales

Lindsey H. Morales
Agent for Creditor
McCalla Raymer Leibert Pierce, LLP
1635 Village Center Circle, Suite 130
Las Vegas, NV 89134
(702-906-0053
Email: lindsey.morales@mccalla.com

CERTIFICATE OF SERVICE

I certify that a true and accurate copy of the foregoing *Notice of Debtor's Request for Forbearance* was served upon the following parties in the following fashion on this 24th day of January, 2022:

Debtor

Sonja D. Ogden

128 Engletown Road
Honey Brook, PA 19344
CHESTER-PA
SSN / ITIN: xxx-xx-0557

represented by **DIANA M. DIXON (by ECF)**
Dixon Law Offices
107 N. Broad Street
Suite 307
Doylestown, PA 18901
215-534-1258
Email: dianamdixonesq@gmail.com

Trustee

KENNETH E. WEST (by ECF)

Office of the Chapter 13 Standing
Trustee
1234 Market Street - Suite 1813
Philadelphia, PA 19107
215-627-1377

U.S. Trustee

United States Trustee (by ECF)

Office of the U.S. Trustee
200 Chestnut Street
Suite 502
Philadelphia, PA 19106
(215) 597-4411

I CERTIFY UNDER PENALTY OF PERJURY THAT THE FOREGOING IS TRUE AND CORRECT.

Executed on January 24, 2022

By: /s/ Lindsey H. Morales
Lindsey H. Morales